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*Lead Counsel for Lead Plaintiffs Mark Combs,  
Vlad Iacob, and Benjamin Northey*

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH**

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In re:

**SAFEMOON US LLC,**

Debtor.

Bankruptcy Case No. 23-25749  
Chapter 7

Honorable Joel T. Marker

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**STIPULATED MOTION TO EXTEND THE DEADLINE FOR CLASS ACTION  
PLAINTIFFS TO FILE PROOFS OF CLAIMS**

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Lead Plaintiffs Mark Combs, Vlad Iacob, and Benjamin Northey (collectively, the “***Class Action Plaintiffs***”), through counsel, together with Ellen E. Ostrow (the “***Trustee***”), the duly-appointed trustee in the above-captioned Chapter 7 bankruptcy case (the “***Bankruptcy Case***”) filed by SafeMoon US LLC (the “***Debtor***”), by and through her undersigned counsel, hereby file this stipulated motion (the “***Motion***”) extending the time for the Class Action Plaintiffs to file their proofs of claim (the “***Claims***”). In support thereof, the parties state as follows:

1. On December 14, 2023 (the “**Petition Date**”), the Debtor filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code, and Ellen E. Ostrow has been appointed as the chapter 7 trustee.

2. On April 17, 2024, the Court entered the *Order (I) Establishing Deadlines for Filing Proofs of Claims; (II) Approving Form and Manner of Notice Thereof; and (III) Granting Related Relief* [ECF No. 152] (the “**Bar Date Order**”). The Bar Date Order set a deadline of July 22, 2024 as the deadline for parties to file Claims in the Bankruptcy Case (the “**Bar Date**”).

3. On June 11, 2024, the Class Action Plaintiffs filed a *Motion for Order Certifying the Class for Purposes of the Class Claim Pursuant to Fed. R. Civ. P. 23 and Fed. R. Bankr. P. 7023 and 9014(c)* [ECF No. 182] (the “**Class Claim Motion**”).

4. The Class Action Plaintiffs requested a hearing on the Class Claim Motion, but due to scheduling conflicts, the Court is not available to hear the Class Claim Motion until after the Bar Date.

5. Accordingly, the Class Action Plaintiffs requested the Trustee agree to extend the Bar Date set forth in the Bar Date Order until 30 days after the Court rules on the Class Claim Motion, and the Trustee agreed.

6. Based on the foregoing, the parties stipulate and respectfully request the Court extend the Bar Date as to the Class Action Plaintiffs only to September 27, 2024.

DATED: June 24, 2024

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s/ John T. Jasnoch

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*Local Counsel for Lead Plaintiffs*

DATED: June 24, 2024

/s/ Ellen E. Ostrow  
Geoffrey S. Goodman  
Ellen E. Ostrow  
*Attorneys for Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of June 2024, a true and correct copy of the foregoing **STIPULATED MOTION TO EXTEND THE DEADLINE FOR CLASS ACTION PLAINTIFFS TO FILE PROOFS OF CLAIMS** shall be served on the parties in the manner designated below:

**By Electronic Service:** I certify that the parties of record in this case, as identified below, are registered CM/ECF users:

<b>Matthew James Burne</b> matthew.burne@usdoj.gov; James.Gee@usdoj.gov; Lindsey.Huston@usdoj.gov; Rinehart.Peshell@usdoj.gov; Rachell e.D.Hughes@usdoj.gov; Brittany.Dewitt@usdoj.gov.	UT33@ecfcbis.com.
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DATED: June 24, 2024

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